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Indiana Superintendent of Public Instruction

## ***English Learners and Title I, Part A: Purposeful Design and Coordination***

*Please note that this guidance is not meant to supersede federal regulations regarding Title I, Part A of ESEA nor provide exhaustive guidance regarding Title I, Part A. School districts will use local and contextual information to inform programming decisions for their students.*

**Purpose:** This document will provide guidance on serving eligible English learners (ELs) through Title I of the Elementary and Secondary Education Act of 1965, reauthorized by No Child Left Behind of 2001. Title I, Part A is the largest federal grant provided to Indiana, with over 200 million dollars allocated annually. Educators can use this document as a resource to provide purposeful support to English learners, eligible for Title I, in order to meet the general provisions under this program of improving the academic achievement of the disadvantaged while avoiding supplanting of other programs, such as Title III, that serve English learners.

Section 1112 (b)(1)(E)(ii) of ESEA states “the local education agency will coordinate and integrate services provided under this part [Title I] with other educational services at the local educational agency or individual school level, such as services for children with limited English proficiency, children with disabilities, migratory children, neglected or delinquent youth, Indian children, homeless children, and immigrant children in order to *increase program effectiveness, eliminate duplication, and reduce fragmentation of the instructional program.*”

This document is a collaborative effort from the Office of Title I, Office of English Learning and Migrant Education, and Office of Grants Management. If you have any questions regarding the law as it applies to English learners that are eligible for Title I, please contact:

IDOE Office of English  
Learning  
and Migrant Education  
317-232-0555  
[www.doe.in.gov/elme](http://www.doe.in.gov/elme)

IDOE Office of Title I  
317-233-3041  
[www.doe.in.gov/titlei](http://www.doe.in.gov/titlei)

IDOE Office of Grants  
Management  
317-232-0540  
[www.doe.in.gov/grantsmgt](http://www.doe.in.gov/grantsmgt)

**Eligibility:** Title I, Part A provides that limited English proficient (LEP) students are eligible for Title I services on the same basis as other children selected to receive services. In schools operating school wide programs, where the goal is to upgrade the instructional program in the entire school, all children, including LEP students, are intended to benefit from the program and the needs of all students are to be taken into account in the program design. In targeted assistance schools (schools not operating school wide programs), LEP students are to be selected for services on the same basis as other children--on the basis of multiple, education related, objective criteria for determining which children are failing or most at risk of failing to meet the State's student performance standards. No longer does a local educational agency need to demonstrate that the needs of LEP students stem from educational deprivation and not solely from their limited English proficiency.<sup>1</sup>

Additionally, Title I funds may not be used to provide services that are required to be made available to LEP students by other laws, such as the core EL program required by Lau of 1974 that an LEA must provide using state or local funds only. Title I funds may be used to coordinate and supplement those services, including language acquisition services for LEP students, in order to meet the provisions of supplement not supplant. Title I staff members providing supplemental services to eligible LEP students must work closely with the core EL staff and content area teachers.

**Intersection of Programs:** Students arrive at school with many different needs and therefore qualify for different programs. For example, Indiana has English learners who are not yet fluent but meet a district's qualifications for gifted and talented. Certain native English speakers might qualify for Title I support while some English learners do not. An English learner might have a disability based upon factors unrelated to language proficiency and subsequently receive special education support. In order for a school to truly meet the needs of a particular student, all programs for which an English learner qualifies need to coordinate their services so that the supports are aligned and build upon each other. However, since LEAs receive federal funding specific for their respective activities, LEAs must be sure to clearly understand the laws regarding English learners and authorized activities so that any federally funded activities meet the provision of supplement not supplant of Section 1120A(b) of Title I and Section 3115(g) of Title III of the ESEA.

**Appropriate Use of Title I and Title III Funded Supplemental Programs for ELs:**

- 1) Title I funded programs must be research based and supplemental to the core EL program. The district's core EL program required by Lau 1974, Castaneda 1981 can only be provided via state and local funds (reviewed on page 4). Title I funded programs must NOT satisfy the core EL program. Please note that research based programs do not have to be purchased but rather could be locally developed based upon research based best practices for English learners. For more information, please visit the National Clearinghouse for English Language Acquisition at [www.ncela.us](http://www.ncela.us)
- 2) Title I funded programs can only be implemented in Title I funded schools; and
- 3) Title I programs can provide a prior level of support that serve the same purpose as Title III programs (i.e. providing language development), but they have to follow all the Title I

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<sup>1</sup> Memorandum to Chief State School Offices from the U.S. Department of Education, June 20, 1995

regulations and be supplemental. If implemented district wide, the amount of Title I funding cannot exceed the proportion of funding based on the number of ELs in Title I schools v. non-Title I schools. In other words, a school district cannot allocate more Title I money to a certain school based upon the number of English learners attending that school. All students eligible for Title I funding, both native English speakers and English learners, are equally eligible. (Section 1115(b)(2)a)

- a. LEAs using Title I, Part A funds to provide a language instruction educational program (as defined in Part C of Title III of the ESEA) must provide an [Annual Parent Notification](#) to parents of LEP children identified for participation in the program. School districts receiving Title III or Non-English Speaking Program (NESP) grants already disseminate this information annually to parents and would not have to provide a duplicate notification. The notification to parents must be provided within the first 30 days of the school year or within 2 weeks of enrollment if the student enrolls later in the year. (Section 1112(g)(1), Section 3302, and IC 20-30-9-9)

**Improper Use of Title I and Title III Funded Supplemental Programs for ELs:**

- 1) Title I or Title III services supplant or take the place of the district's core EL program required by Lau 1974 and Castaneda 1981
- 2) District or school uses funds to pay for something that was paid for in the previous year with other federal, state, or local funds (an LEA may be able to refute this presumption, however, if it can demonstrate that those services could not be continued due to state/local fund budget constraints)
- 3) Title III funds utilized for programs/services required by other federal, state or local laws.  
Example: If a student is eligible for Title I and Title III, then Title III cannot be used to take the place of services that the student was already eligible for under Title I; the student would be eligible for both.

## ***Hierarchy of Related Federal Laws and Programs***

An English learner's core instruction programming is unique because it has an additional component of an EL program that is not present for native English speaking students. The Office of Civil Rights (OCR) requires LEAs to identify students who need language assistance, develop a program that has a reasonable chance of success, support it with the appropriate number of staff and resources, and evaluate its success. A school district must provide a core EL program prior to utilizing Title I and Title III funds. The chart below shows the succession of programs if an English learner was eligible for Title I, Title III, and migrant services.

### Title I, Part C Migrant (for eligible students)

Supplemental services provided to identified migrant students who qualified due to a move across district lines in search of seasonal, agricultural work.



### Title III (for all LEP students regardless of Title I participation)

Supplemental language development services provided to LEP students *above and beyond* the core instruction, core EL program, and if applicable, Title I services.

Title III federal funds can be used for this purpose.



### Title I

Supplemental services provided to LEP students eligible for Title I.

For school-wide, all students are eligible. For targeted assistance, LEP students are eligible using the same criteria as all students.

Title I funds provide academic support to students, including LEP students, to meet Indiana's challenging academic achievement standards. LEAs may also use Title I, Part A funds to provide a language instruction educational program (as defined in Part C of Title III of the ESEA) for LEP students eligible for Title I.

Title I federal funds can be used for this purpose.



### Core EL program (required by Lau 1974, Castaneda 1981)

Required by [federal law](#) to be provided to limited English proficient (LEP) students. These English language development services are in addition to the core instruction. State and local funds are used to provide the core EL program. *Must occur in the absence of federal funds. Federal funds (i.e. Title I or III) cannot be used to provide the core EL program.*



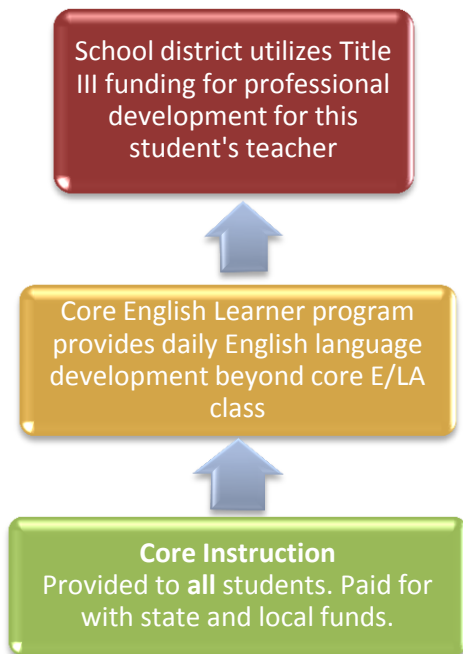
## **Core Instruction**

Provided to **all** students. Paid for with state and local funds.

## Sample Student Specific Programming

Since many students are not eligible for all federal programs (i.e. Title I, Title III, migrant, etc), then school districts will utilize the hierarchy on page 4 to provide services in an appropriate manner to support the student through coordination of services while not supplanting.

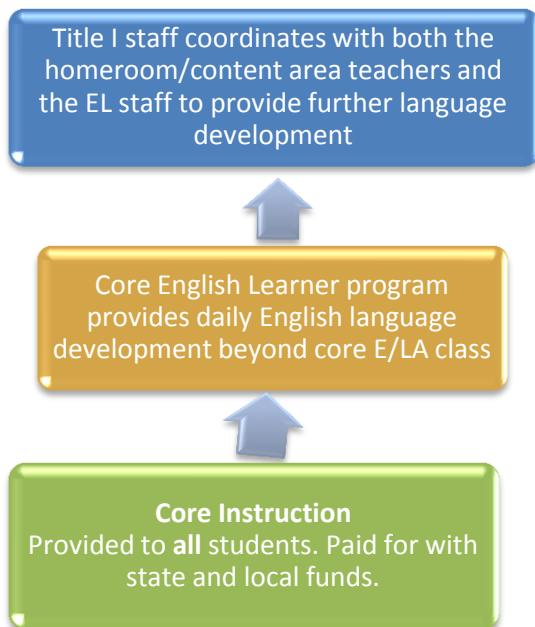
*Example A: An English learner receiving Title III services but enrolled in a non-Title I school*



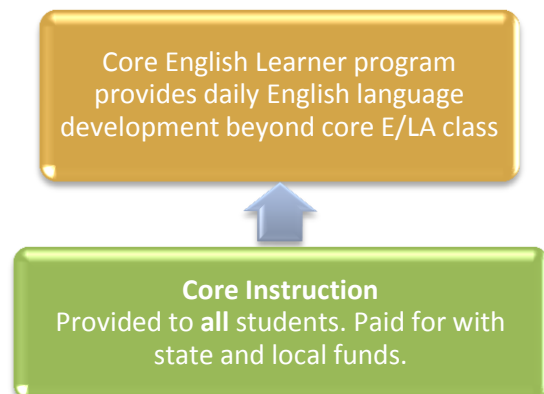
*Example B: An English learner receiving Title III services and enrolled in a targeted assistance Title I school*



*Example C: An English Learner in a Title I school but in a district that does not apply for Title III funding*



*Example D: An English Learner in a non-Title I school and in a district that does not apply for Title III funding*



# ***State and Local Title I Plans***

## **State Plan:**

*Standards:* The state plan is required to demonstrate that the state has adopted challenging academic standards for all students, including English learners. English learners must be provided equal access in learning and are held to all state academic standards. In order to accomplish this, then the state must also adopt English language development standards to ensure that LEP students acquire English language skills to be successful. Indiana adopted the WIDA English language development standards in 2013. More information can be found at [www.wida.us](http://www.wida.us) and <http://www.doe.in.gov/elme/wida-english-language-development-eld-standards-framework>. The core EL program required by Lau 1974, Title I, Title III, and any other program that a LEP student qualifies for should coordinate services so that the objectives are aligned to reach the same goal: academic success.

*Yearly Progress:* Equal access to learning the same material is a right for English learners but also a challenge. The same high performance standard is the expectation for all students, so schools need to develop benchmarks and progress monitoring methods to ensure that English learners' progress can be measured.

*Elementary and Secondary Education Act (ESEA) Flexibility Waiver:* In February 2012, Indiana received approval of a waiver offering flexibility regarding some of the requirements of the No Child Left Behind Act (ESEA as reauthorized in 2001) during the U.S. Department of Education's first review cycle of state waiver applications. Indiana's ESEA Flexibility Waiver, which can be found at <http://www.doe.in.gov/esea>, specifically requires the state to:

- Adopt English language development (ELD) standards in order for limited English proficient students to be able to achieve the same challenging academic content standards as all children
- Develop an Annual Measurable Objective (AMO) specifically for limited English proficient students to create benchmarks at which LEP students achieve proficiency on state assessments in English/language arts and mathematics
- Monitor and improve the rate at which English learners participate in college and career readiness coursework, such as Advanced Placement, dual enrollment, or technical courses

*Assessment:* The state plan must include an assessment (ISTEP+) to measure the performance of all children, including English learners. The results of that assessment are then disaggregated to determine if each subgroup, such as LEP students, is meeting benchmarks to demonstrate progress. Limited English proficient students are afforded accommodations in order to "level the playing field" to demonstrate their content area proficiency, according to the students' Individual Learning Plans (ILPs). Additionally, *Castañeda v. Pickard* (1981) requires school districts to develop a research based EL program, support it appropriately, and then evaluate its progress. Title I and Title III supplement this program in order for students to be successful. The

same assessment measures, such as regular literacy progress monitoring, can be used to both determine the success of the EL program and determine whether a student should be eligible for Title I in a targeted-assistance school. School wide Title I programs allow the greatest flexibility as all students are Title I eligible.

*Annual Measurable Achievement Objectives (AMAOs):* Each school district receiving Title III funds is held accountable for its English learners (section 3122(a) to:

AMAO Part 1: Annually increase in the number or percentage of children making progress in learning English

AMAO Part 2: Annually increase in the number or percentage of children attaining English proficiency by the end of each school year, as determined by a valid and reliable assessment of English proficiency consistent with section 1111(b)(7)

AMAO Part 3: Meet the Annual Measurable Objective for its limited English proficient subgroup set forth by the Indiana ESEA federal flexibility waiver

#### **Local Education Agency (LEA) Plan:**

*Development:* About 75% of language minority children are disproportionately present in schools with high poverty<sup>2</sup>, which causes many English learners to be eligible for Title I services. The school's Title I service plan should include staff members with a strong foundational knowledge of second language acquisition and the specific issues that English learners face. This requires extensive collaboration and cross training among Title I, EL, and content area staff members. Section 1112 (b)(1)(E)(ii) of ESEA states "the local education agency will coordinate and integrate services provided under this part [Title I] with other educational services at the local educational agency or individual school level, such as services for children with limited English proficiency, children with disabilities, migratory children, neglected or delinquent youth, Indian children, homeless children, and immigrant children in order *to increase program effectiveness, eliminate duplication, and reduce fragmentation of the instructional program.*" This will require collaboration between all services to which an English learner is entitled, such as Title I, core EL program, content area instruction, special education, and so on.

The Title I service plan would recognize the needs of English learners while also recognizing the value that these students bring to the school. Parents of LEP students must be offered the opportunity to meaningfully participate in the program, which will often require the use of bilingual materials and bilingual staff members.

*Design:* If a school expects to provide effective Title I instruction to its English learners, then content area and Title I staff need to be trained in the best practices of teaching English learners

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<sup>2</sup> Hakuta, K. (1998). *Improving education for all children: Meeting the needs of language minority children*. In D. Clark (ed.), *Education and the Development of American Youth*. Washington, DC: The Aspen Institute.

and not expect the EL staff alone to be the experts in this area. For example, a school with any size of EL population may wish to hire Title I staff that have an English learner dual license or extensive EL training in order to provide language development during Title I instruction. Additionally, further guidance in this document will explain how schools can use the Title I program to supplement the core EL program by utilizing bilingual staff members, supplemental EL support, and additional teacher training to improve the academic achievement of English learners.

*RTI Support:* Decisions to place English learners in certain Tier II interventions should be made respective to the LEP students' current English language proficiency level and the progress that is currently occurring within Tier I, which includes the core EL program. Districts should utilize a progress monitoring screener to identify EL students at risk of academic failure by comparing the EL student's performance to other EL students from a similar background and language proficiency. WIDA, which is used by educators to develop English learners' academic language skills via the Indiana adopted WIDA English language development (ELD) standards, provides the following reference resources regarding RTI and English learners:

- WIDA's Response to Instruction & Intervention (RTI) for English Learners: <http://www.wida.us/get.aspx?id=601>
- WIDA's RTI Planning Form: <http://www.wida.us/get.aspx?id=613>
- WIDA's RTI for ELLs Webinar: <http://www.wida.us/get.aspx?id=614>

*All of these resources can be found in WIDA's download library section at <http://www.wida.us/downloadLibrary.aspx>*

**Tier II interventions do not satisfy the Lau 1974 requirements to provide a core EL program and are not considered English language development instruction. Additionally, the core EL program is required to be provided with state and local funds only; Title I commonly funds Tier II interventions and therefore must be additional to the core EL program services to which an English learner is already entitled.** Many English learners simply need more academic language development in order to meaningfully access the same content standards, and Title I can support this work by using Title I instruction to provide additional language instruction. Many interventions are designed to be used with monolingual native English speakers who are struggling to develop literacy and numeracy skills; these interventions are not meant to develop academic language among English learners. When designing Title I instruction for English learners, schools should utilize several quantitative and qualitative data points to determine appropriate Title I supports for an LEP student. Placing an LEP student in an intervention based solely upon progress monitoring data without the context of the student's language proficiency might cause the student to lose out on valuable language development opportunities at the expense of an intervention that will not be effective for the student. The IDOE encourages schools to differentiate their Title I instruction, as the supports may look different depending on the root cause of why the student is at risk of not meeting the state's challenging academic standards.



Additionally, the IDOE Office of English Learning and Migrant Education has recorded a six-part webinar series titled *What Every Administrator Should Know about Separating Difference from Disability*, which is hosted by Dr. Catherine Collier. These webinars and the power point can be found at [www.doe.in.gov/elme/english-learner-resources](http://www.doe.in.gov/elme/english-learner-resources)

For further assistance, please reference the RTI section of the EL Guidebook, located at [www.doe.in.gov/elme](http://www.doe.in.gov/elme)

## Example A: Title I Intervention Schedule

- School utilizes progress monitoring data to determine Title I intervention
- English learners are included in these groups, but the data is not analyzed respective to the students' English proficiency levels to determine if the student needs the intervention or more language development
- Same type of intervention is provided to all students, even though some students are at risk of academic failure due to reading difficulties while others are learning the language
- This type of schedule might not be effective for many English learners since the Title I instruction is not designed to fit the needs of the students

## Example B: Title I Intervention Schedule

- School analyzes the progress monitoring data of students at risk of academic failure to determine which English learners are more proficient (i.e. Level 4) and would benefit from an intervention OR which English learners are at risk due to low language proficiency
- The Title I intervention small groups are differentiated so that some periods of the day are interventions while other periods of the day allow this Title I staff member to provide more language development for English learners, which might include developing vocabulary skills, writing proficiency, reading comprehension etc.
- This type of schedule might be more effective for many English learners since the Title I instruction is designed to fit the needs of the students

### **School Wide Programs:**

*Development:* Schools that employ a school wide Title I program is able to offer the greatest flexibility of service to all their students, including ELs. Title I schools with at least 40% poverty based on Free/Reduced lunch counts are eligible to implement a school wide program. Title I Priority and Focus schools may waive the 40% requirement and be eligible to implement a school wide program. In either case, a year of planning is required in order to develop a comprehensive plan that will support the students' performance at both the school and classroom levels. Title I funded staff members, such as EL paraprofessionals that are supplemental to the core EL program, can then work with any LEP student in the school.

*Components:* A school is successful if it is effective for all groups of students. The same instructional measures that are effective for all students will be beneficial to English learners. However, schools must employ additional measures or emphasis on the specific needs of English

learners, such as the WIDA English language development (ELD) standards. The culture of the school must value the presence of English learners and honor the students' native languages. Oral proficiency and literacy in the first language can be used to facilitate literacy development in English.<sup>3</sup> Schools will utilize a variety of approaches to support its students, including English learners at different levels of English proficiency. The school might utilize a Title I EL teacher for intensive reading support for Levels 1-2 beyond the core EL program where a Title I EL paraprofessional would push-in to the classroom to support joint productive activities in small groups. Parents are a vital component of a successful school, and parents with limited English proficiency must have the same equal opportunity to participate in their children's education and activities. Title I funds can be used to provide effective outreach to inform parents, in an understandable language, regarding core academic achievement, meeting state standards, and attaining English proficiency.

### **Targeted Assistance Schools:**

*Development:* Targeted assistance schools might utilize this method of providing Title I support because it does not have the 40% threshold of low-income families to operate a school wide program or choose to not utilize the school wide model. In a targeted assistance school, all migrant, disabled, and LEP children are eligible for Title I services on the **same measures as any other student**. If the LEP student's current level of English proficiency is at the newcomer or beginner status, then the school might instead assign a proxy score (such as zero) for the LEP student to justify providing Title I services. The student's English language proficiency placement or annual assessment could be used as documentation of placement in the Title I program. A norm-referenced assessment does not have to be used to justify an LEP student's participation in the Title I program, as all LEP students are expected to have the same equal access to the performance standards of all students. Title I services will support an English learner achieving the expected performance outcomes. In addition to the EL students' core EL program required by Lau of 1974, Title I can be used to promote content learning, English language proficiency, and to develop native language literacy. In the case of parent interviews or compact letters, then the Title I interview and information should be shared in a language understandable to the parent, which can be supported via Title I funds.

*Components:* Title I staff provide services for eligible ELs based upon the same measures used to identify any student. The instruction for ELs must be challenging while differentiated based upon the students' English proficiency levels. The curriculum for ELs must be conceptually challenging. Coordination among all staff members, including content area teachers, EL staff, Title I staff, Title III staff, and others is important so that the plan for each student is delivered in an integrated fashion. Teachers should deliver culturally responsive instruction in order to acknowledge the culture of the students and the value that it brings to the school and classroom. All instruction, including Title I support, should incorporate language objectives for an English learner in addition to the content objective. For instance, a math, social studies, or

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<sup>3</sup> August, D. and Shanahan, T. (2006). *Developing Literacy in Second-Language Learners: Report of the National Literacy Panel on Language-Minority Children and Youth*. Center for Applied Linguistics, Lawrence Erlbaum Associates: Mahwah, NJ.

science lesson is still a great time to learn language and a student often needs specific language skills to be able to demonstrate the content area knowledge. Properly training Title I staff in second language acquisition and providing comprehensible instruction to English learners will help the students reach the same high performance standards as all students. English learners are more effective when learning is authentic and meaningful, which occurs when the instruction is culturally relevant. Native English speaking students are often great models for LEP students; educators that regularly provide interaction opportunities among native English speakers and LEP students through joint productive activities and instructional conversations promote academic success of all their students.

## ***Parent Involvement***

*Activities:* An LEA may only receive a Title I, Part A grant if the LEA implements programs and activities for the involvement of parents assisted via Title I. Additionally, LEAs that receive over \$500,000 must reserve at least 1% of allocated Title I funds for parent involvement activities. The LEA must address barriers to great participation by parents who are economically disadvantaged, disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background. LEAs would provide, to the extent possible, that information related to school and parent programs, meetings, and other activities is sent to the home of participating children in the language used in such homes. Communicating in the same native language as the parents, both verbally and in written form, encourages greater participation. If this is not possible, such as a parent who speaks Xhosa and no staff or community member can interpret, then the school should provide information in English that avoids jargon and language that is not understandable to non-native speakers of English. This similar method might be helpful for all parents, even native English speakers, as educational terms are not sometimes easily understood. Parents with limited English proficiency need to be included; these parents might serve on school improvement or curriculum teams to ensure that the needs of their students are addressed within the school's plan.

*Strategies:* LEAs might use Title I funds to hire bilingual parent liaisons to increase parental involvement of all parents, especially parents with limited English proficiency. Schools could create parent resource rooms where parents can feel welcome and access information to help support their children's education. Family literacy programs could be offered to help parents understand the academic instruction provided by the school; schools could use Title I funds to provide literacy materials in English or the native language of the students. Native language materials will allow the students to continue building their native literacy skills, which is a great predictor of success in English for ELs, while developing content area knowledge in an understandable language.

## ***Professional Development***

*Activities:* Targeted and sustained professional development is key for all teachers, especially those who work with culturally and linguistically diverse populations. Title I funds can support professional development in Title I schools to develop any teacher's knowledge of second language acquisition, strategies to support comprehensible input for ELs, cultural competency, and other activities to enable all children to meet the state's student performance standards.

## ***Use of Title I Funds for English Learners***

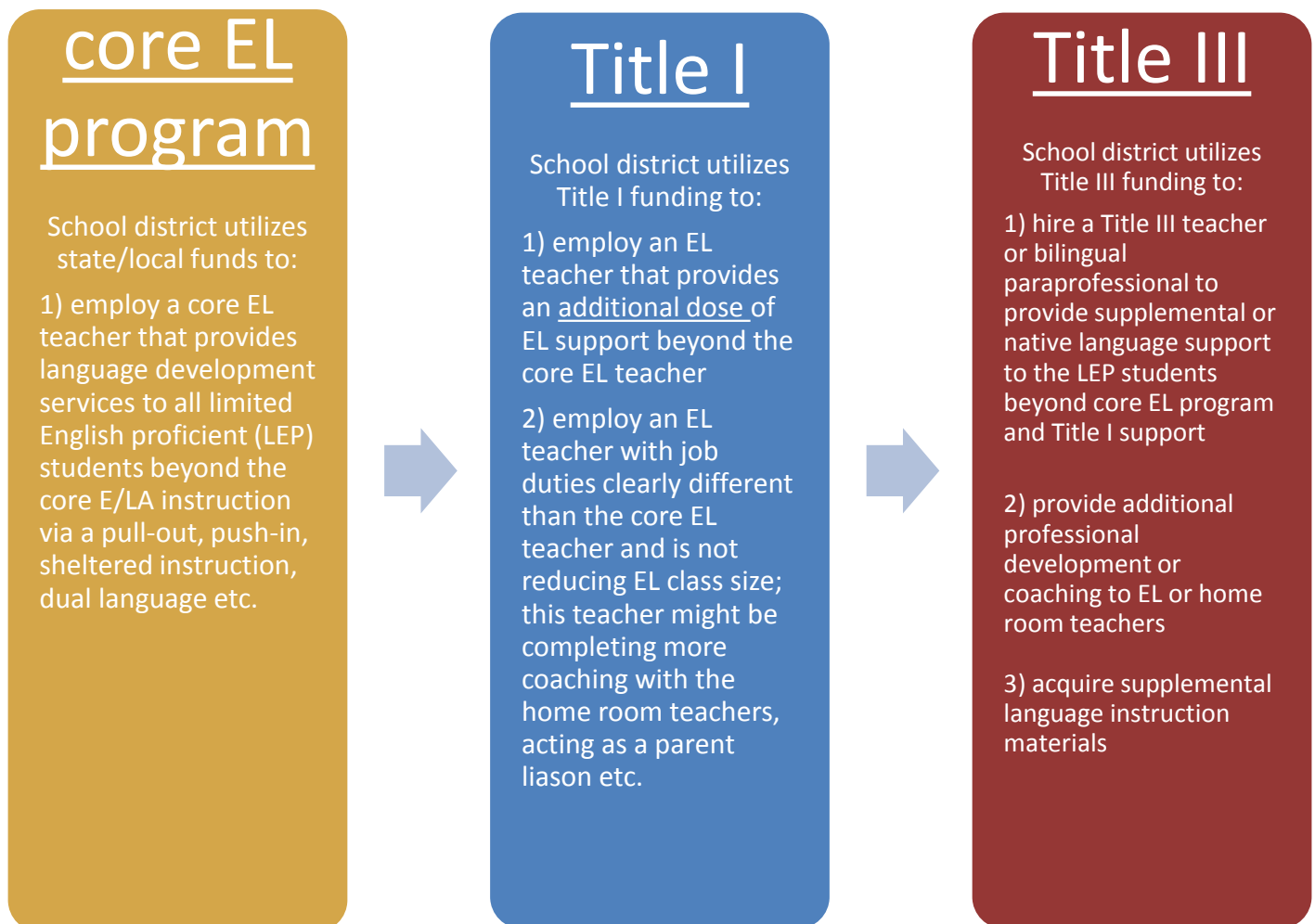
*Activities:* Title I, Part A funds are expended at the LEA level to meet the needs identified in the comprehensive needs assessment process. In a school wide Title I program, the funds are used to improve student performance and upgrade the entire educational program of the school. In a targeted assistance school, the funds are used only to meet the needs of children identified as being in the greatest need of services. Suggested activities for ELs eligible for Title I and their families, identified via the comprehensive needs assessment, and meet the provisions of supplement not supplant include:

- i. Extended day programs, such as tutoring, summer school, or intersessions
- ii. Language instruction program (as defined by Part C of Title III of ESEA)
- iii. Supplemental, research-based E/LA, math, science, social studies, or foreign language instruction (which includes the students' native languages)
- iv. Supplemental instruction materials and technology to help ELs meet grade-appropriate state standards and address language needs
- v. Parent involvement, including addressing barriers to greater participation by parents with limited English proficiency, such as family literacy programs that focus on the development of English literacy, English language, and parent-child reading activities for ELL students
- vi. Supplemental Title I-EL personnel; see pages 13-15 for guidance and specific scenarios to avoid supplanting of core EL programs

## Intersection of Personnel Supports

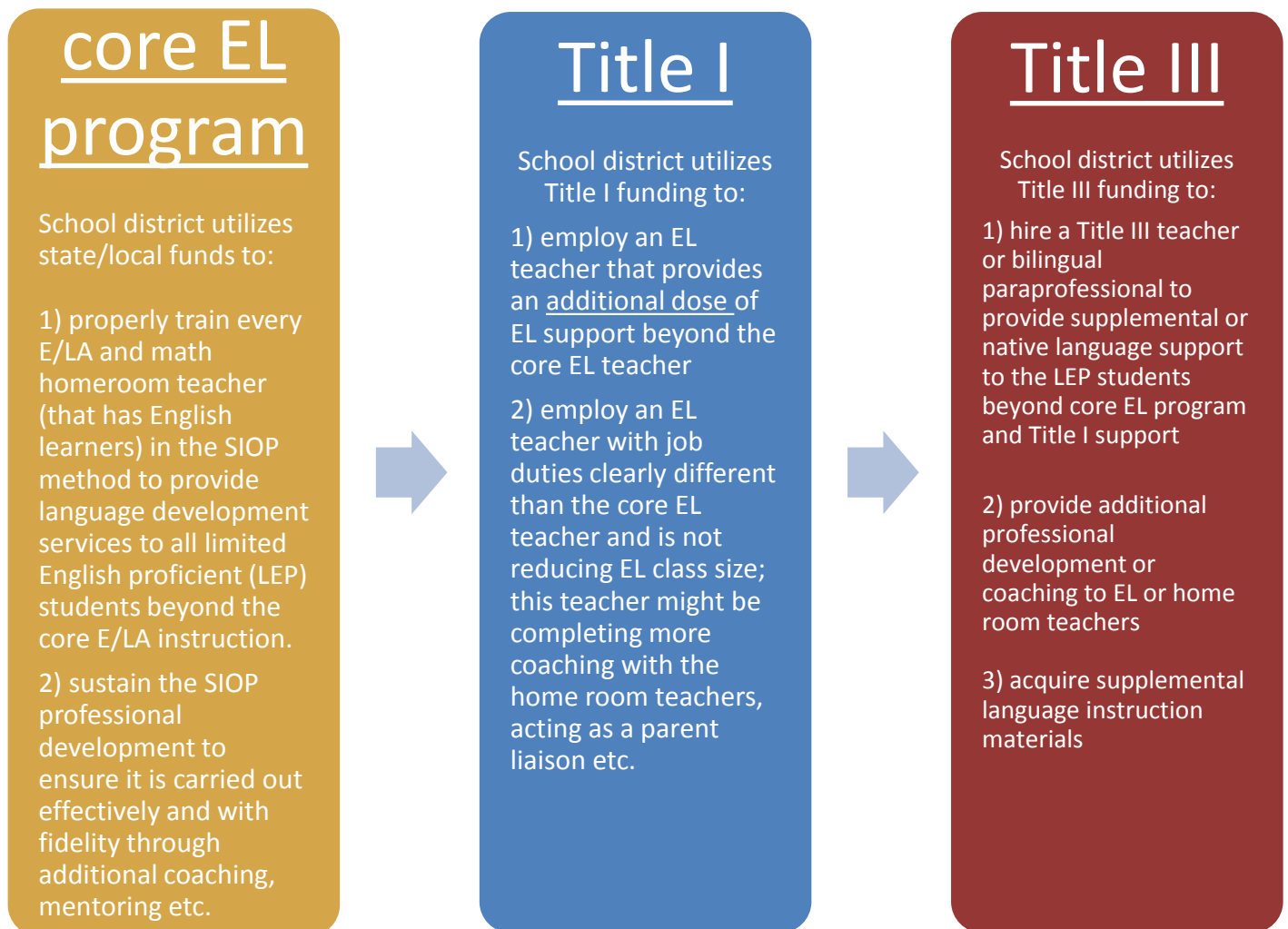
In order to determine how Title I and Title III funds can be used to support English learners, a school district must first develop and clearly state its core EL program (required by Lau 1974, Castaneda 1981). Please note that the following scenarios are *examples* and the scenario is dependent on how each step (core EL program, Title I, and Title III) is fulfilled. If a school district has questions about the eligibility of federal funds for certain activities or personnel, please contact the appropriate IDOE Title I or Title III office.

Sample A: Hire a supplemental EL teacher with Title I funds. (In a school wide Title I school, the Title I staff can work with any student. In a targeted assistance Title I school, the Title I staff can only work with identified students eligible for Title I.)



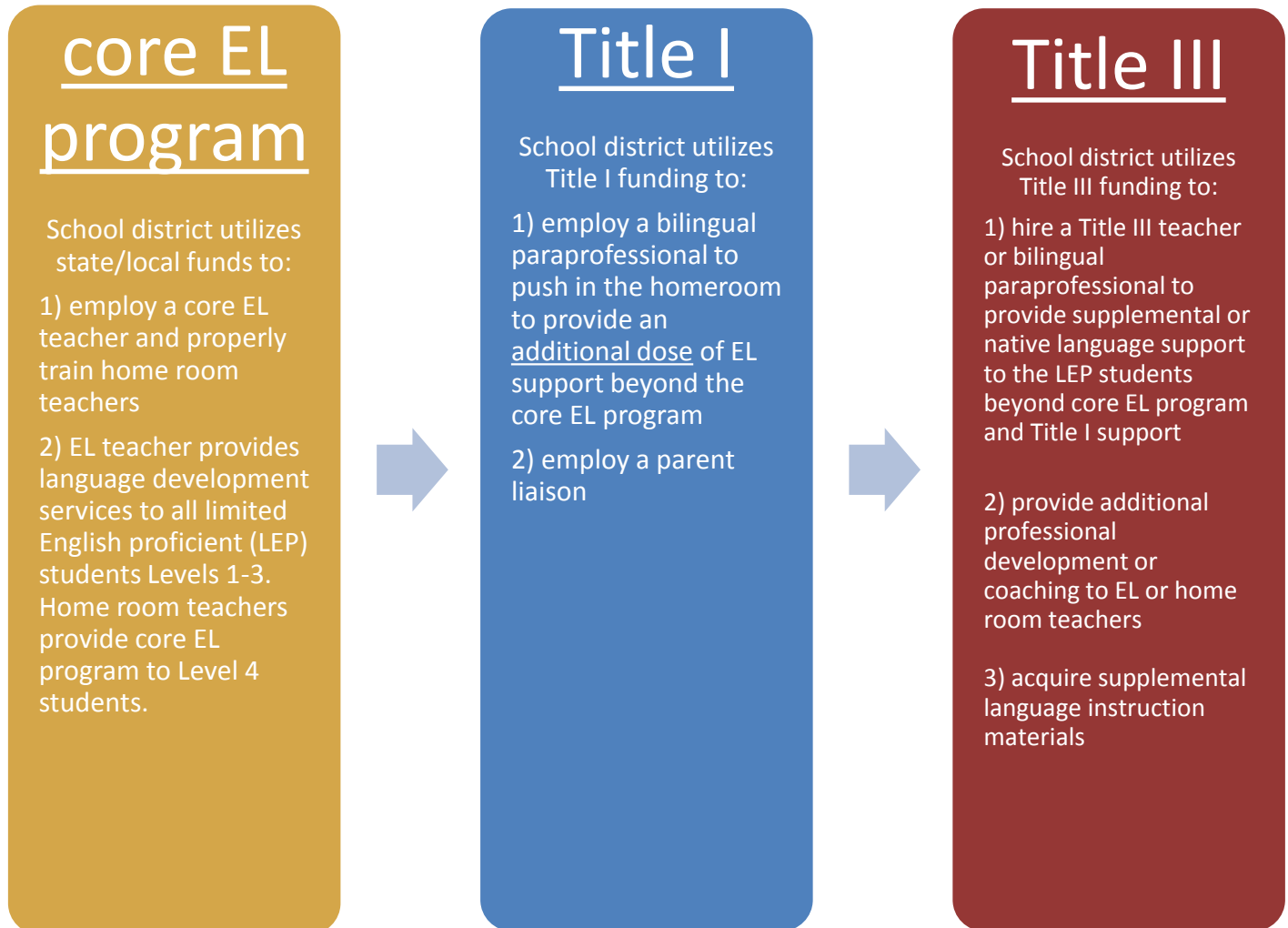
**Key Supplanting Guidance: The Title I or III funded teacher must have a job description that is clearly supplemental to the core EL teacher position. The Title funded teacher would not be able to administer English proficiency assessments, ISTEP, IREAD, ECA etc. since these must occur in the absence of federal funds; or school district could split fund this teacher with state/local funds for**

Sample B: Hire a supplemental EL teacher with Title I funds. (In a school wide Title I school, the Title I staff can work with any student. In a targeted assistance Title I school, the Title I staff can only work with identified students eligible for Title I.)



**Key Supplanting Guidance:** The school district must be able to clearly demonstrate that each home room teacher delivering the core EL program for an LEP student has been properly trained and implements the LEP student's ILP daily in order for the EL teacher to be supplemental. The Title I or III funded teacher would not be able to administer English proficiency assessments, ISTEP, IREAD, ECA etc. since these must occur in the absence of federal funds; or school district could split fund this teacher with state/local funds for time/effort to complete testing.

Sample C: Hire a supplemental EL paraprofessional with Title I funds. (In a school wide Title I school, the Title I staff can work with any student. In a targeted assistance Title I school, the Title I staff can only work with identified students eligible for Title I.)



**Key Supplanting Guidance:** The EL paraprofessional alone cannot satisfy the core EL program requirements. The Title I or III funded paraprofessional would not be able to assist with the administration of English proficiency assessments, ISTEP, IREAD, ECA etc. since these must occur in the absence of federal funds; or school district could split fund this staff member with state/local funds for time/effort to assist with the testing. Federally funded staff may only translate or interpret for activities related to the specific program (i.e. Title I) and cannot translate or interpret for regular school communication or activities required by other state, local, or federal laws. See [here](#) for more information.

**Additional Resources:**

August, D., & Hakuta K. (1995). LEP Students and Title I. *Stanford University*. Retrieved from [http://www.stanford.edu/~hakuta/Publications/\(1995\)%20-%20LEP%20Students%20and%20Title%20I%20A%20GUIDEBOOK%20FOR%20EDUCATORS.pdf](http://www.stanford.edu/~hakuta/Publications/(1995)%20-%20LEP%20Students%20and%20Title%20I%20A%20GUIDEBOOK%20FOR%20EDUCATORS.pdf)

Holbrook, D. (2014). Using Title I Funding to Support ELs and Avoiding Supplanting of Core EL Programs. *TESOL Conference*. Retrieved from <https://docs.google.com/viewer?a=v&pid=sites&srcid=ZGVmYXVsdGRvbWFpbnxuYXRpb25hbGVsbHxneDozNTI3NDI5N2Y0ZWYyZDE0>

IDOE Title I Guidance <http://www.doe.in.gov/titlei>

Title I, Part A Laws, Regs, and Guidance  
<http://www2.ed.gov/programs/titleiparta/legislation.html#waiver>

Title III Non-regulatory Guidance for Standards, Assessment, and Accountability  
<http://www.doe.in.gov/sites/default/files/elme/title-iii-non-regulatory-guidance-part-ii-standards-assessments-and-accountability.pdf>